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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

LYDIA FABEND, ROSEMARIE
MURPHY, KIMBERLY DAVIS and all
others similarly situated,

Plaintiffs,

v.

L'OREAL USA, INC., LANCÔME, INC.,
LANCÔME LUXURY PRODUCTS, LLC,

Defendants.

Civil Action No. 12-03571(WJM)(MF)

ORDER

THIS MATTER having been opened to the Court by Carella, Byrne, Cecchi, Olstein, Brody & Agnello ("Carella Byrne"), counsel for Plaintiffs, in the presence of all counsel of record, and the Court having read the papers, and on notice to counsel for Defendant, and for good cause appearing,

IT IS THIS _____ day of _____, 2012

ORDERED as follows:

1. The Court hereby appoints James E. Cecchi Interim Lead Class Counsel to act on behalf of the Plaintiffs and the putative Class with the responsibilities set forth below:

- a. determine and present (in briefs, oral argument, or such other fashion as may be appropriate, personally or by a designee) to the Court and opposing parties the position of the Plaintiffs on all matters arising during pretrial proceedings;
- b. coordinate the initiation and conduct of discovery on behalf of Plaintiffs and the putative Class consistent with the requirements of the Federal Rules;
- c. convene meetings among Plaintiffs' counsel;
- d. conduct settlement negotiations on behalf of Plaintiffs and the putative Class;
- e. delegate specific tasks to other counsel in a manner to ensure that pretrial preparation for the Plaintiffs and the putative Class is conducted efficiently and effectively;
- f. enter into stipulations with opposing counsel as necessary for the conduct of the litigation;
- g. monitor the activities of all counsel to ensure that schedules are met and unnecessary expenditures of time and funds are avoided;
- h. perform such other duties as may be incidental to the proper coordination of Plaintiffs' pretrial activities or authorized by further order of the court.
- i. serve as the primary contact for communications between the Court and other Plaintiffs' counsel;
- j. ensure that all notices, orders, and material communications are properly distributed (to the extent that they are not otherwise served on Plaintiffs' counsel via the Court's electronic filing system);
- k. negotiate and enter into stipulations with defense counsel as necessary to promote the efficient advancement of this litigation;
- l. communicate with defense counsel as necessary to promote the efficient advancement of this litigation; and

m. make available to other Plaintiffs' counsel documents produced by the defendant.

2. In addition to the duties described above, Interim Lead Counsel shall have the sole authority to form an Executive Committee of other interested counsel as he deems appropriate.

3. This Order shall apply to each action subsequently filed in or transferred to the United States District Court for the District of New Jersey.
